

## **REMARKS/ARGUMENTS**

Claims 3-6 are pending in the present application. Claims 1, 2, and 7 were canceled and claim 3 was amended. Support for the amendment to claim 3 can be found in the specification at least at page 14, lines 9-15, and Figure 7A, block 1.2.3. Reconsideration of the claims is respectfully requested.

### **I. 35 U.S.C. § 112, Second Paragraph**

The Examiner has rejected claims 3-6 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter, which Applicants regard as the invention. This rejection is respectfully traversed.

Regarding this rejection, the Final Office Action states:

Claim 3 recites the limitation "the integrated portal page". There is insufficient antecedent basis for this limitation in the claim.

Final Office Action dated March 17, 2008, p. 2.

Applicants contend that sufficient antecedent basis for "the integrated portal page" has been provided. The feature of claim 3 referenced by the Examiner is as follows:

rendering **an integrated portal page** by traversing the new navigation tree, wherein rendering the integrated portal page comprises:  
responsive to identifying references to the remote portal fragment in the new navigation tree during rendering, establishing communication with the remote portal and receiving a markup of the remote portal fragment for displaying the remote portal fragment into **the integrated portal page**.

Applicants respectfully point out that claim 3 first recites "an integrated portal page" before reciting "the integrated portal page." As such, sufficient antecedent basis has been provided with respect to "the integrated portal page." Therefore the rejection of claims 3-6 under 35 U.S.C. § 112, second paragraph has been overcome.

### **II. 35 U.S.C. § 102, Anticipation**

The Final Office Action has rejected claims 1-7 under 35 U.S.C. § 102 as being anticipated by *Hamada et al.*, Method and Apparatus for Editing Web Document From Plurality of Web Site Information, U.S. Publication 2002/0078105, June 20, 2002 (hereinafter "*Hamada*"). This rejection is respectfully traversed.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). In this case, each and every feature of claim 1 is not identically shown in the cited reference, arranged as they are in claim 1. Independent claim 1 recites the following:

3. A method for dynamically integrating a portal fragment of a remote portal into a local portal while maintaining a look and feel of the local portal, of the method comprising:
  - identifying a reference in an existing navigation tree of the local portal representing a placeholder for a navigation tree of the remote portal fragment, wherein the navigation tree defines a relationship between nodes of the navigation tree;
    - establishing communication with the remote portal;
    - receiving meta-information from the remote portal describing the navigation tree of the remote portal fragment to be integrated;
    - merging the existing navigation tree with the navigation tree of the remote portal fragment to be integrated resulting in a new navigation tree; and
    - rendering an integrated portal page by traversing the new navigation tree, wherein rendering the integrated portal page comprises:
      - responsive to identifying references to the remote portal fragment in the new navigation tree during rendering, establishing communication with the remote portal and receiving a markup of the remote portal fragment for displaying the remote portal fragment into the integrated portal page.

Specifically, *Hamada* does not anticipate claim 1 because *Hamada* does not teach “responsive to identifying references to the remote portal fragment in the new navigation tree **during rendering**, establishing communication with the remote portal and receiving a markup of the remote portal fragment for displaying the remote portal fragment into the integrated portal page,” as recited as amended claim 1. *Hamada*, on the other hand, discloses the generation of a composition web document by first extracting portions of other web documents, then rendering the composition web document. In other words, assuming *arguendo* that the “other web documents” of *Hamada* are properly interpreted as remote portals and that the “composition web page” of *Hamada* is properly interpreted as an integrated portal page as proposed by the Examiner, *Hamada* discloses establishing a communication with other web documents **before rendering** the composition web document. Claim 1, on the other hand, recites that establishing communication with the remote portal and receiving a markup of the remote portal fragment for

displaying the remote portal fragment into the integrated portal page is performed **during rendering** of the integrated portal page. For example, *Hamada* discloses the following:

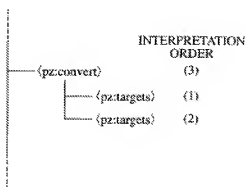
At the step S103, when it is judged as the XML-P'z document, the server A1 activates the XML-P'z language processing system (a composition processing unit 1 of FIG. 1), extracts portions (partial documents) of specified ranges from web documents (pages) W2 and W3 of specified web servers (web servers A2 and A3 in this example), inserts them into specified positions in the XML-P'z document, and applies a conversion processing to a specified range described in the XML-P'z document. Eventually, an XML document (a composed web document) W1 is obtained as a processing result of the XML-P'z language processing system.

*Hamada*, p. 4, para. 72.

In this passage, *Hamada* discloses that partial documents are first extracted from web pages, and then inserted into specified positions in an XML-P'z document. Thereafter, the XML-P'z undergoes conversion processing to obtain a composed web document referencing the partial documents. Restated, *Hamada* discloses that communication with the web documents occurs first for extracting partial documents. Afterward, the composition document is obtained (i.e., rendered) through subsequent processing. Thus, because *Hamada* discloses establishing a communication with other web documents **before rendering** the composition web document, *Hamada* does not anticipate amended claim 1.

Moreover, Figure 12 supports Applicants' argument that *Hamada* discloses a different order of operation, and thus does not anticipate amended claim 1. Figure 12 is as follows:

FIG. 12



*Hamada*, Figure 12.

Figure 12 depicts a tree of commands and an associated interpretation order. In particular, Figure 12 indicates that the interpretation order lists the processing of *pz:targets* commands before the *pz:convert* command. The significance of this interpretation order is evident in light of other passages of *Hamada*. For example, *Hamada* indicates that, “The functions required for composing a plurality of web documents

into a single web document can be narrowed down to three types include extraction, insertion, and conversion.” (*Hamada*, p. 3, para. 58.) Regarding insertion commands, *Hamada* discloses that “commands to be provided include a partial document **insertion command** indicating which portion of which web page is to be extracted and where it is to be inserted.” (*Hamada*, p. 3, para. 60.) With respect to conversion commands, *Hamada* provides that a “**conversion command** receives a range of information and a conversion rule as inputs and **outputs a document** obtained as a conversion result.” (*Hamada*, p. 4, para. 60.) In addition, *Hamada* discloses that the insertion command is “pz.targets” and that the conversion command is “pz.convert.” (*See, e.g., Hamada*, page 4, para. 77.)

Thus, in view of Figure 12 and the portions of *Hamada* identified in the paragraph above, *Hamada* discloses that insertion commands are performed before conversion commands. Insertion commands require communication with other web documents for extracting partial documents and inserting the partial documents into a composition web document. Since conversion is the process that outputs a document (i.e., rendering), Figure 12 of *Hamada* indicates that insertion, and thus communication with other web documents, must occur before rendering, as is evident by the interpretation order listing the pz.targets commands first and the pz.convert command last. Consequently, *Hamada* does not disclose the feature, “rendering an integrated portal page by traversing the new navigation tree, wherein rendering the integrated portal page comprises: responsive to identifying references to the remote portal fragment in the new navigation tree **during rendering**, establishing communication with the remote portal and receiving a markup of the remote portal fragment for displaying the remote portal fragment into the integrated portal page,” as recited by amended claim 1.

In addition, because claims 4-6 depend from claim 1, the same distinctions between *Hamada* and the claimed invention in claim 1 apply for these claims. Therefore, it is respectfully urged that the rejection of claims 3-6 under 35 U.S.C. § 102 has been overcome. Furthermore, *Hamada* does not teach, suggest, or give any incentive to make the needed changes to reach the presently claimed invention. Absent the Examiner pointing out some teaching or incentive to implement *Hamada* and “rendering an integrated portal page by traversing the new navigation tree, wherein rendering the integrated portal page comprises: responsive to identifying references to the remote portal fragment in the new navigation tree during rendering, establishing communication with the remote portal and receiving a markup of the remote portal fragment for displaying the remote portal fragment into the integrated portal page,” as recited by amended claim 1, one of ordinary skill in the art would not be led to modify *Hamada* to reach the present invention when the reference is examined as a whole. Absent some teaching, suggestion, or incentive to modify *Hamada* in this manner, the presently claimed invention can be reached only through an improper use of hindsight using the Applicants’ disclosure as a template to make the necessary changes to reach the claimed invention.

### III. Conclusion

It is respectfully urged that the subject application is patentable over the cited reference and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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